

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CHRISTOPHER ROMANO,

Defendant.

) Criminal No. 25cr10115  
)  
) Violation:  
)  
) Count One: Illegal Gambling Business  
) (18 U.S.C. § 1955)  
)  
) Forfeiture Allegation:  
) (18 U.S.C. § 981(a)(1)(C) and  
) 28 U.S.C. § 2461(c))  
)

INDICTMENT

COUNT ONE

Illegal Gambling Business  
(18 U.S.C. § 1955)

The Grand Jury charges:

From a date unknown to the Grand Jury, but beginning no later than in or around February 2018, and continuing thereafter until a date unknown to the Grand Jury, but to at least in or around June 2021, in the District of Massachusetts, and elsewhere, the defendant,

CHRISTOPHER ROMANO,

and others known and unknown to the Grand Jury, conducted, financed, managed, supervised, directed, and owned all and part of an illegal gambling business which was in violation of the laws of the Commonwealth of Massachusetts (Chapter 271, Sections 16A, 17, and 17A of the General Laws of the Commonwealth of Massachusetts), involved five and more persons who conducted, financed, managed, supervised, directed, and owned all and part of such business, and was in substantially continuous operation for a period in excess of thirty days and had a

gross revenue of \$2,000 in any single day.

All in violation of Title 18, United States Code, Sections 1955 and 2.

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FORFEITURE ALLEGATION  
(18 U.S.C. §981(a)(1)(C) and 28 U.S.C. § 2461(c))

The Grand Jury further finds that:

1. Upon conviction of the offense alleged in violation of Title 18, United States Code, Section 1955, set forth in Count One, the defendant,

CHRISTOPHER ROMANO,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

  
FOREPERSON

BENJAMIN TOLKOFF  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: April 2, 2025.

Returned into the District Court by the Grand Jurors and filed.

/s/ Alexandra Traganos

DEPUTY CLERK